

**UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS**

MATTHEW CRANE,
Plaintiff

v.

JOSEPH KOZLOWSKI,
ERIC ORTIZ, MICKEY DUMAIS,
JOSEPH BRUNELLE,
CHICOPEE POLICE
DEPARTMENT and
THE CITY OF CHICOPEE,
Defendants

CIVIL ACTION NO. 3: 20cv30159

PLAINTIFF'S MOTION FOR LEAVE TO AMEND HIS COMPLAINT

Now comes plaintiff in the above matter and moves this Court to allow him leave to file an amended complaint. The proposed amended complaint is filed herewith as an Exhibit to this motion. Plaintiff files herewith a Memorandum in Support of this motion.

WHEREFORE, plaintiff respectfully requests the Court to allow his motion to Amend his complaint, and to file the proposed amended complaint submitted herewith.

Plaintiff,
by his attorney,

/s/ Ryan P. McLane, Esq.
Ryan P. McLane (BBO # 697464)
McLane & McLane, LLC
975-A Springfield Street
Feeding Hills, MA 01030
Ph. (413) 789-7771
Fax (413) 789-7731
E-mail: ryan@mclanelaw.com

CERTIFICATE OF CONSULATION

Pursuant to L.R. 7.1(a)(2), the undersigned hereby certifies he has conferred prior to the filing of the within motion, with counsel for the Defendants in a good faith attempt to resolve or narrow the issue which is the subject of the within motion by emails with Defendants' counsel on December 24 and 26, 2020, at which time counsel indicated the matter could not be agreed-to or resolved.

/s/ Ryan P. McLane
RYAN P. MCLANE

CERTIFICATE OF SERVICE

I certify that a true copy of the within document was filed through the ECF system and will be sent electronically to the registered participants as identified on the notice of electronic filing and paper copies will be sent to those indicated as non-registered participants on December 28, 2020.

/s/ Ryan P. McLane
RYAN P. MCLANE